

Name: TODD MICHAEL SCHULTZ

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In Pro Per

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

TODD MICHAEL SCHULTZ

Plaintiff

MICHAEL C. THOMPSON  
GREGORY R. HOLMES  
YOUTUBE LLC

Defendant(s).

CASE NUMBER:

2:23-CV-03452-JAK-MRWx

To be supplied by the Clerk of  
The United States District Court

**DECLARATION TO SHOW  
WHY PLAINTIFF SHOULD  
NOT PAY SANCTIONS TO  
THE DEFENSE OR  
COURT**

PLAINTIFF, TODD MICHAEL SCHULTZ, understood the RFA's as not being overseen by the courts until the "discovery". He construed there to be nuance in this matter. He believed that Judge Wilner's striking of the document was merely reflecting that "inter-party discovery" did not constitute "discovery." It was and is a legal theory. Plaintiff does not believe there has been cooperation but does not know how to iterate it properly to the court. Plaintiff believed that filing the OBJECTIONS to the RFA would demonstrate a lack of cooperating.

Plaintiff asks the court for mercy and understand that he believed that the RFA would not be "discovery" until it was lodged under Judge Wilner. This very well may have been a midjudgment and Plaintiff is apologetic and still not very clear on the differences between discovery, exhibits and the like. .

1 Plaintiff in Pro Per, takes responsibility and asks the court for mercy for  
 2 failing to adhere to the rules that he should have known and implemented  
 3 with more of a beginner's mind. Plaintiff did not see Docket # 36 as a motion.  
 4 Plaintiff believed it was superfluous, not denied. A mistake to file at that time  
 5 as discovery had not begun. However, the definition and scope of discovery  
 6 seems to be debated online and I firmly believed that inter-party communications  
 7 did not constitute discovery after doing potentially bad research.  
 8

9  
 10 Plaintiff assumes responsibility and will abide the courts  
 11 decision. Plaintiff apologizes thoroughly for any harm caused to the court or  
 12 opposing counsel through his actions. He was merely caught up in a  
 13 difficult and complicated process that he is sworn to learn and uphold if he  
 14 decides to use it. He also swears under penalty of perjury that all stated  
 15 here is true.  
 16

Signed by:

17  
 18 Dated August 21, 2023

Todd Michael Schultz

19  
 20 **Mr. Thompson and Mr. Holmes' counsel**  
**Mark D. Hurwitz**

(Plaintiff)

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